

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

JANE DOE, on behalf of JOHN DOE, her  
minor child,

Plaintiff,

v.

MARTY SMALL, SR., in his official  
capacity as Mayor of Atlantic City, New  
Jersey, and individually,

LA'QUETTA SMALL-FRAZIER, in her  
official capacity as Former Principal of  
Pennsylvania Avenue School, and  
individually,

BARRY CALDWELL, in his official  
capacity as current Superintendent of the  
Atlantic City School District,

PAUL A. SPAVENTA, in his official  
capacity as former Interim Superintendent of  
the Atlantic City School District,

ATLANTIC CITY BOARD OF  
EDUCATION, a public entity, and

KAYAN AHMED FRAZIER, an individual,

Defendants.

Civil Action No.: 1:21-cv-11189

**CERTIFICATION OF  
TERRELL A. RATLIFF, ESQ.  
IN SUPPORT OF MOTION FOR  
*PRO HAC VICE* ADMISSION OF  
ANDRES JALON, ESQ.**

I, Terrell A. Ratliff, Esquire, of full age, being duly sworn, according to law, upon my oath do hereby depose and say:

1. I am an attorney-at-law of the State of New Jersey and am an associate with the Lento Law Group, P.C., attorneys for Plaintiff, JANE DOE on behalf of JOHN DOE, her minor child, in the above-captioned matter. As such, I am fully familiar with the facts contained herein.

2. I, Terrell A. Ratliff, Esq., a member of the bar of this Court, hereby respectfully move for the Admission *Pro Hacer Vice* of Andres Jalon, Esquire.

3. Andres Jalon is chief counsel of Jalon & Associates, located at 1500 JFK Blvd., Suite 1300, Philadelphia, Pennsylvania 19102, and is a member in good standing of the bar of the Commonwealth of Pennsylvania.

4. Mr. Jalon, has been made fully familiar with the facts of this matter and is experienced with handling the legal issues relating to this lawsuit.

5. Pursuant to L. Civ. R. 101.1(c), I, Terrell A. Ratliff, Esq., the attorney of record in this matter, understand that I will continue to serve as counsel of record for the Plaintiff herein, and will sign all pleadings, briefs, stipulations, and other papers filed with the Court, and will participate in all proceedings. Further, I agree to promptly notify the attorney admitted *pro hac vice* of the receipt of all notices, orders, and pleadings.

6. Pursuant to L. Civ. R. 101.1(c), I, Terrell A. Ratliff, Esq., further understand that I shall be held responsible for the conduct of this case and for the conduct of the attorney admitted *pro hac vice*.

7. Mr. Jalon agrees to submit to all rules of practice and procedure for this Court, and will work closely with the attorney of record, Terrell A. Ratliff, Esq., in connection with this case. See Certification of Andres Jalon, Esq., filed concurrently herewith.

8. The fee required per L. Civ. R. 101.1(c)(2) and New Jersey Court Rule 1:28-2 will be provided to the New Jersey Lawyers' Fund for Client Protection within twenty (20) days of the entry of the Court's Order admitting Mr. Jalon *pro hac vice*.

9. Further, payment in the amount of \$150.00 shall be made to the Clerk of the United States District Court as per L. Civ. R. 101.1(c)(3) within twenty (20) days of the entry of the Court's Order admitting Mr. Jalon *pro hac vice*.

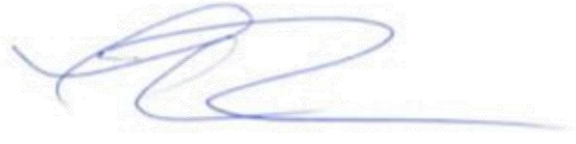
10. WHEREFORE, I, Terrell A. Ratliff, Esq., counsel of record for the Plaintiff herein, respectfully request that this Honorable Court admit Andres Jalon, Esq., *pro hac vice* pursuant to the Federal and Local Rules of Civil Procedure as aforesaid.

I hereby certify that the foregoing statements made by me are true to the best of my knowledge.

I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Dated: March 22, 2022

LENTO LAW GROUP, P.C.



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